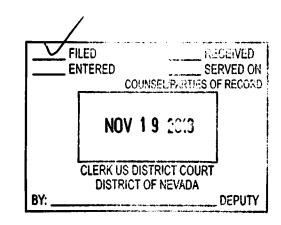
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1 ADAM PAUL LAXALT Attorney General 2 IAN CARR, Bar No. 13840 Deputy Attorney General 3 State of Nevada Bureau of Litigation 4 Public Safety Division 100 N. Carson Street 5 Carson City, Nevada 89701-4717 Tel: (775) 684-1209 6 E-mail: icarr@ag.nv.gov



Attorneys for Defendant Romeo Aranas

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Case No. 3:16-cv-00759-MMD-CBC

DANNY WILLIAMS,

Plaintiff,

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ROMEO ARANAS, et al.,

Defendants.

H_____

MOTION FOR EXTENSION OF TIME TO

FILE RESPONSIVE PLEADING

KRDER

Defendant, Dr. Romeo Aranas, by and through counsel, Adam Paul Laxalt, Attorney General of the State of Nevada, and Ian E. Carr, Deputy Attorney General, hereby submits his Motion for Extension of Time to File a Responsive Pleading. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendant respectfully requests a thirty (30) day extension of time out from the current deadline (November 19, 2018) to file a responsive pleading in this case. Defense counsel is confronted with numerous competing deadlines and a high workload due to staffing changes in the Office of the Attorney General. However, such obstacles are currently being resolved and the requested extension of time should afford Defendant adequate time to file a responsive pleading in this case.

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Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendant's request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will allow for a thorough response to Plaintiff's allegations. The requested thirty (30) day extension of time should permit Defendant time to adequately research and respond to Plaintiff's allegations. Defendant asserts that the requisite good cause is present to warrant the requested extension of time.

For these reasons, Defendant respectfully requests a thirty (30) day extension of time from the current deadline to file a responsive pleading in this case, with a new deadline to and including Wednesday, December 19, 2018.

DATED this 16th day of November, 2018.

ADAM PAUL LAXALT Attorney General

By:

IAN CARR

Deputy Attorney General State of Nevada Bureau of Litigation

Public Safety Division

Attorneys for Defendant Romeo Aranas

-HT IS SO ORDERED.

S. MAGISTRATE JUDGE

DATED: <u>////9/201</u>9

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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 16th day of November, 2018, I caused to be deposited for mailing a true and correct copy of the foregoing, MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING, to the following:

Danny Williams 609 Standford Way Sparks, NV 89431

An employee of the Office of the Attorney General